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Attorney for Defendants

TEACHBK, INC., ILYA KISELEV, and

ANDREI BURTSEV

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

MIRIAM GOLDBERG, a/k/a Marina  
Sokolovskaya,

Plaintiff,

vs.

TEACHBK, INC., ILYA KISELEV and  
ANDREI BUTSEV

Defendants.

**Case No.: 3:24-cv-4525**

**DECLARATION OF PAVEL  
LEDESTIMMINOV IN SUPPORT OF  
DEFENDANTS' SPECIAL MOTION TO  
STRIKE PLAINTIFF'S COMPLAINT**

**[Cal. Civ. Proc. Code § 425.16]**

**Date: November 12, 2024**

**Time: 10:30 a.m.**

**Judge: Hon. Lisa J. Cisneros**

**Dept: Courtroom G, 15<sup>th</sup> Floor**

**Location: San Francisco Courthouse  
450 Golden Gate Ave.,  
San Francisco, CA 94102**

**Action Filed: July 26, 2024**

1 I, PAVEL LEDESTIMMINOV, declare:

2 1. I have personal knowledge of the facts set forth in this declaration and am  
3 competent to testify as a witness. If called as a witness, I could and would testify to the truth of  
4 the matters set forth herein. I make this declaration in support of Defendants' Special Motion to  
5 Strike Plaintiff's Complaint.

6 2. I was born in Russia, and lived there until May 19, 2023, when I fled Russia due  
7 to my opposition to the current Putin regime.

8 3. While I was still residing in Russia, I contacted Marina Sokolovskaya ("Marina"  
9 or "Plaintiff") for a consultation on whether my experiences and story is sufficient basis for  
10 seeking political asylum in the United States. I learned of Marina from her YouTube channel,  
11 where she put out videos about immigration and offered legal evaluation of political asylum  
12 cases. At the time I contacted Marina, I believed she was a licensed attorney or an immigration  
13 specialist because of the language and materials that were included in her YouTube videos.

14 4. In response to her offer of legal evaluation, I sent a message to the Telegram  
15 account listed on Marina's YouTube description. In my message, I provided personal  
16 information about my political situation, including details about biographical, my ideas and  
17 beliefs about the current government, and key reasons I plan on seeking asylum in the United  
18 States.

19 5. Several days later, I received a response from Marina, in which she declined to  
20 work on my case. She accused me of lying and fabricating my story. She also responded:  
21 "you'll piss off the judge and get a deportation order". She continued:

22 "These actions are often also a deliberate staging, a  
23 fraudulent strategy. The prosecutor in the immigration  
24 court will see this and understand it immediately and get  
25 mad. You can predict your fate further yourself."

26 6. I was taken aback by Marina's response because I sent her true and real facts  
27 about myself. I did not lie or make up anything in the story that I provided to Marina for the  
28 consultation.

1           7.       Within a week of Marina's response, I was notified of a new YouTube video that  
2 was posted on Marina's channel, titled Разбор Реального Дела / Analysis of a Real Case. I  
3 was shocked to discover that this new video consisted of Marina reading, *verbatim*, the details I  
4 provided to Marina in my Telegram message.

5           8.       A short time after this YouTube video was posted, I was visited by and received  
6 calls from local police several times, which caused me to leave my house and reside in an  
7 undisclosed location until I left for the United States.

8           9.       I told my story to Ilya Kiselev and Andrei Burtsev, and they interviewed me,  
9 with my permission, about this on their YouTube channel TechBK.

10          10.      I also filed a complaint with the California State Bar about Marina's disclosure  
11 of my private information provided in the course of legal consultation. I later learned that  
12 Marina works for Modern Law Group.

13          I declare under penalty of perjury, under the laws of the State of California, that the  
14 foregoing is true and correct and that this declaration was executed in Orangevale, California on  
15 the date below.

16 //

17 Date: 10.07.2024

  
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PAVEL LEDESTIMMINOV